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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: : 11 Civ. _____
: :
AMBAC FINANCIAL GROUP, INC., : Bankr. Case No. 10-15973
: : (SCC)
Debtor, :
: :
AMBAC FINANCIAL GROUP, INC., :
: Plaintiff, : Adv. Pro. No.: 10-4210
v. : :
UNITED STATES OF AMERICA, :
: Defendant. :
: :
-----x

**NOTICE OF MOTION TO WITHDRAW THE REFERENCE
PURSUANT TO 28 U.S.C. § 157(d)**

PLEASE TAKE NOTICE that upon this notice of motion and the accompanying memorandum of law and declaration of Daniel P. Filor, defendant the United States of America, by and through its attorney Preet Bharara, United

States Attorney for the Southern District of New York, moves this Court for an Order pursuant to 28 U.S.C. § 157(d) withdrawing the reference from the United States Bankruptcy Court for the Southern District of New York to the United States District Court for the Southern District of New York.

Dated: New York, New York
January 13, 2011

Respectfully submitted,

PREET BHARARA
United States Attorney for the
Southern District of New York

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